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14

15 **UNITED STATES DISTRICT COURT**  
16 **DISTRICT OF NEVADA**

FEDERAL TRADE COMMISSION,	)	
	)	Case No: 17-cv-02000-APG-GWF
Plaintiff,	)	
	)	
v.	)	<b>STIPULATION OF ALL PARTIES TO</b>
	)	<b>STAY CASE AND TOLL DEADLINES</b>
REVMOUNTAIN, LLC, <i>et al.</i> ,	)	<b>PENDING COMMISSION'S AND</b>
	)	<b>COURT'S REVIEW OF PROPOSED</b>
Defendants.	)	<b>SETTLEMENTS</b>
	)	

23 Counsel for Plaintiff Federal Trade Commission ("FTC" or "Commission") and all  
24 Defendants have agreed on the terms of proposed settlements, subject to review and approval by  
25 the Commission. The FTC and Defendants stipulate herein to the entry of an order staying any  
26 further proceedings in this case and tolling all deadlines to allow the Commission to vote on the  
27 proposed settlements and, should the Commission vote in favor, to allow the Court to consider  
28 them. In support of this request, the FTC and Defendants state as follows:

1 Defendants have signed proposed settlements – *i.e.*, Stipulated Permanent Injunctions  
2 and Other Equitable Relief – that FTC counsel plans to recommend to the Commission. The  
3 FTC is an independent federal agency. Therefore, FTC counsel does not have authority to file  
4 the proposed settlements until the Commission reviews and approves them. The Commission  
5 approval process takes some time, usually 60 to 90 days.

6 If the Commission approves the proposed settlements, FTC counsel promptly will file  
7 the proposed settlements with the Court. If the proposed settlements have not yet been filed  
8 with the Court by May 21, 2018, FTC counsel propose to advise the Court of the status of this  
9 case by filing a status report at that time. If any of the settlements are rejected by the  
10 Commission or otherwise break down, the FTC plans to file a motion to lift the stay and  
11 recalculate the tolled deadlines.

12 Respectfully submitted this 26th day of February, 2018.

13 /s/ SARAH WALDROP  
14 SARAH WALDROP  
MICHELLE SCHAEFER  
Attorneys for Federal Trade Commission

15 /s/ GIOVANNI RUSCITTI  
16 GIOVANNI RUSCITTI  
Attorney for Defendant Blair McNea and all  
17 Corporate Defendants

18 /s/ RACHEL HIRSCH  
19 RACHEL HIRSCH  
Attorney for Defendant Danielle Foss

20 /s/ RICHARD NEWMAN  
21 RICHARD NEWMAN  
Attorney for Defendant Jennifer Johnson

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24 **IT IS SO ORDERED:**

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27 UNITED STATES MAGISTRATE JUDGE

28 DATED: 2/27/2018 \_\_\_\_\_

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PROOF OF SERVICE

I hereby certify that I served the foregoing Stipulation of All Parties to Stay Case and Toll Deadlines Pending Commission's and Court's Review of Proposed Settlements on February 26, 2018, on counsel for all parties as follows via the CM/ECF filing system:

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